

William McCann, Esq.  
[wdmccann@gmail.com](mailto:wdmccann@gmail.com)

April 4, 2019

Judge Dennis Montali  
United States Bankruptcy Court  
450 Golden Gate Avenue  
San Francisco, CA 94102

Judge William Alsup  
United States District Court  
450 Golden Gate Avenue  
San Francisco, CA 94102

**FILED**

APR 15 2019  
UNITED STATES BANKRUPTCY COURT  
SAN FRANCISCO, CA 33

**SUBMITTED UNDER SEAL AND BY CERTIFIED MAIL**

*Re: PG&E Bankruptcy Case No. 19-30088 (DM) and United States v. PG&E  
Case No. 3:14-cr-00175-WHA*

Dear Judges Alsup and Montali,

We once has the dubious pleasure of snorkeling off the Cocos Islands and observed white tipped reef sharks in a feeding frenzy. We do not have a photo to share with the Court, but a similar orgy is depicted in

<https://www.pond5.com/stock-footage/48265551/whitetip-reef-sharks-feeding-frenzy-night-cocos-islands-cost.html>.

A literary reference emanating from the pen of Vincent Bugliosi, he of Manson family fame, is *And the Sea Will Tell* which depicts similar pre-prandial white tip behavior. So.

The purpose of this letter is to ask that the Bankruptcy and Federal Court abate the feeding frenzy of New York law firms upon the carcass of the PG and E fire victims, and, in fact, upon the group of rate payers who are the ultimate victims of this mendacity. This might be considered, therefore, a *plea in abatement* on behalf of our clients

We have watched with some degree of horror a privilege-sacntioned feeding frenzy, exemplified by a series of motions by law firms purporting to act for, *inter alia*, "The

Unsecured Creditors Committee', 'The Tort Claimants Committee',<sup>1</sup> the 'Independent Directors'.<sup>2</sup>

We respectfully submit that the moneys these firms wish to extract from the estate would be better used paying the claims of innocent and terribly damaged citizens of the State of California than fattening the bank accounts of out-of-state predators.

That is not to imply that lawyers licensed by the State of California who prematurely jumped the bones of these victims are not predatory.

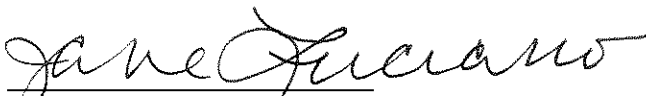
You will be horrified to learn that the contingency fee agreements authored by quondam plaintiff personal injury firms –that should know better – are mysteriously silent on advising clients of the potentiality of catastrophic losses from Bankruptcy Court sanctioned asset securitization, and subsequent Chapter 7 filings by the then asset-stripped corporate shells.

The clients who this office represents will be revealed in due course. At this point we decline to identify them – no more than we would dangle filet mignons from gossamer threads over the denizens of Palmyra's lagoon. Thus we file this *under seal* so as to not exacerbate the very matters that are the subjects of this matter – in short, we do not wish to be bombarded with noxious and attritive paperwork – particular from New York lawyers.

Please consider this a blanket and continuing objection to any and all orders authorizing payment from the bankrupt's estate to any law firms whatsoever representing these so called committees. Said objection extends to law firms representing the debtor, including but not limited to Munger, Tolles & Olson. Such multiple representation is redundant.

We send a copy of this letter to Judge William Alsup, to advise him that we shall be – in due course – filings petitions for restitution in connection with the criminal proceedings before him – on behalf of our clients.

Thank you for your kind attention in these matters.



William D. McCann, Esq.

(Admitted Pro Hac Vice in Certain California Fire Cases)

Jane Luciano, Esq.

---

<sup>1</sup> The implication is that tort creditors are not included in the class of unsecured creditors. Isn't there a way to eclipse this redundancy and save money that could be used to compensate injured victims?

<sup>2</sup> The use of the term 'Independent Directors', in this context, is both a contradiction in terms and a tautology: the human beings purporting to govern PG & E neither directed, nor acted independently, in any manner, shape, or form, and so entitling a committee doesn't alter reality.